

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

Laurie Ortolano,
Plaintiff,

v.

The City of Nashua, *et al.*,
Defendants.

Civil Action No. 1:22-cv-00326-LM

AMENDED EXHIBIT LIST OF THE DEFENDANTS,
STEVEN A. BOLTON AND CELIA K. LEONARD

Defendants Steven A. Bolton, Corporation Counsel for the City of Nashua, New Hampshire, and Celia K. Leonard, a Deputy Corporation Counsel for the City of Nashua, New Hampshire, respectfully submit the following amended exhibit list for trial:

Trial Ex.	ID	Date	Description	Bates # USDC Doc. #
A.	ID	8/17/22	Bolton and Leonard's Motion for Summary Judgment, Exhibit A-1 – Plaintiff email to Nashua Telegraph	71-3
B.	ID	8/27/22	Bolton and Leonard's Motion for Summary Judgment, Exhibit A-2 – Plaintiff blog post “The Colossal Stupidity of the Nashua Legal Office”	71-4
C.	ID	12/18/22	Bolton and Leonard's Motion for Summary Judgment, Exhibit A-3 – Plaintiff blog post “The Police Records of Attorney Bolton”	71-5
D.	ID	11/28/22	Bolton and Leonard's Motion for Summary Judgment, Exhibit A-4 – Plaintiff email to Nashua city officials	71-6
E.	ID	7/18/22	Bolton and Leonard's Motion for Summary Judgment, Exhibit A-5 – Plaintiff comments at Nashua Board of Alderman meeting	71-7

F.	ID	7/20/22	Bolton and Leonard's Motion for Summary Judgment, Exhibit A-6 – Plaintiff comments at Nashua Finance Committee meeting	71-8
G.	ID	8/16/22	Bolton and Leonard's Motion for Summary Judgment, Exhibit A-7 – Plaintiff comments at Nashua Planning and Economic Development meeting	71-9
H.	ID	8/17/22	Bolton and Leonard's Motion for Summary Judgment, Exhibit A-8 – Plaintiff comments at Nashua Finance Committee meeting	71-10
I.	ID	10/12/22	Bolton and Leonard's Motion for Summary Judgment, Exhibit A-9 – Plaintiff comments at Planning and Economic Development meeting	71-11
J.	ID	3/4/24	Bolton and Leonard's Motion for Summary Judgment, Exhibit A-10 – Plaintiff email to Nashua city officials titled "The Notable Moronic Response from the Nashua's Premier Attorney – Leonard"	71-12* corrected with Doc. 79-1
K.		9/11/19	Bolton and Leonard's Motion for Summary Judgment, Exhibit B-1 – Plaintiff email to Leonard "Clarification of the Legal Office Function"	71-14
L.		1/20/21	Bolton and Leonard's Motion for Summary Judgment, Exhibit B-2 – Vincent email to plaintiff "2 signed Abatement Applications"	71-15
M.	ID	5/8/24	Defendants Bolton and Leonard's Reply to Plaintiff's Objection to Motion Summary Judgment, Exhibit A – Nashua police department photos	78-1
N.	ID	7/12/21	Deposition of Plaintiff Ortolano, Exhibit 6 – 9 th Circuit Court, District Division, Nashua, <i>State v. Laurie Ortolano</i> , Case No. 459-2021-CR-00606, Disposition and Sentencing Form	
O.	ID	6/24/22	Deposition of Plaintiff Ortolano, Exhibit 7 – 9 th Circuit Court, District Division, Nashua, <i>State v. Laurie Ortolano</i> , Case No. 459-2021-CR-00606,	

			order granting assented to motion to conditionally discharge conviction	
P. (Q)			Photos of City Hall (Photos 1-5 only)	
Q. (R)	ID	1/22/21- 4/1/22	Chart of Right-to-Know Requests Filed by Ortolano	
R. (S)		1/22/21	Facebook post	
S. (T)		6/25/20	Classic Signs, Inc. invoice for “By Appointment Only” sign	
T. (U)	ID	2/18/21	Arrest Warrant for Laurie Ortolano	
U. (V)		2/18/21	Criminal Trespassing Complaint	
V. (Y)	ID		Sketch of Legal Department	
W. (X)	ID	2021	Timeline	
X. (X-3)	ID	1/21- 1/22/21	Email from Plaintiff to Vincent, et al. re “Totally Unfair Abatement Process”	
Y. (X-4)	ID	1/22/21	Email from Vincent to Plaintiff re: “Here are the abatements signed”	
Z. (X-5)	ID	1/22/21	Facebook Post on Nashua Scoop re: arrest for trespassing	
AA (X-7)		1/23/21	Union Leader Article re: Nashua woman escorted out of Nashua City Hall by police	
BB (X-8)		1/25/21	Nashua Telegraph article re: Police oust public records advocate Ortolano from City Hall	
CC (X-10)	ID	1/27/21	Union Leader article re: No-trespassing order put in place against Nashua woman	
DD (X-11)	ID	1/27/21	Nashua Telegraph article re: “City officials allege Telegraph account of City Hall confrontation ‘featured inaccurate information’”	

EE (X-12)	ID	1/27/21	Email from Ortolano to Jesse Neumann, et al. re “RTK Request dated 1/26/21 (2021-455) – Re: Attorney Leonard should be Fired”	
FF (X-13)	ID	1/30/21	Nashua Telegraph article “Police issue no- trespass order against Laurie Ortolano”	
GG (X-15)	ID	2/3/21	Email from Vincent to Ortolano, et al. re: “I almost got arrested over this and I am still waiting 28 Baltimore & 18 Baltimore St stamped receipts”	
HH (X-16)	ID	2/3/21	Union Leader article “Laurie Ortolano won’t stop taking on City Hall”	
II (X-17)	ID	2/5/21	Ortolano Facebook Post re: Date Stamping Abatement Applications	
JJ (X-18)	ID	2/22/21	Ortolano Facebook post: Good Governments Don’t Do This	
KK (X-19)	ID	2/22/21	Union Leader article “Nashua woman from city hall charged with trespassing”	
LL (X-20)	ID	2/26/21	Email from Ortolano to Richard Vincent, et al. re: The Ortolano Abatement Process	
MM (X-21)	ID	3/4/21	Board of Assessors meeting minutes	
NN (X-22)	ID	3/17/21	Ortolano Facebook post on The Nashua Scoop re: Citizens not receiving proper responses to RTK requests	
OO (X-23)	ID	3/18/21	Board of Assessors meeting minutes	
PP (X-24)	ID		withdrawn	
QQ (X-25)	ID	3/26/21	Granite Grok article by Ortolano re: Nashua’s Right Not-to-Know	
RR (X-26)	ID	4/11/21	Ortolano Facebook post on The Nashua Scoop re: abatement appeal	
SS (X-27)	ID	4/18/21	Ortolano Facebook post on The Nashua Scoop re: Kleiner emails	

TT (X-28)	ID	4/26/21	Excerpt of Budget Review Committee meeting minutes	
UU (X-29)		4/26/21	Email from Ortolano to Bolton, et al. re: Comments in non-public session made about Spitting	
VV (X-30)	ID	4/26/21	Granite Grok post re: Update on Right to Know Lawsuit against Nashua City Hall	
WW (X-31)	ID	4/27/21	Email from Ortolano to Bolton, et al. re: Bolton has no ethics	
XX (X-32)		4/28/21	Ortolano post on goodgov.org re: A Story About a Crooked Mayor	
YY (X-33)	ID	4/29/21	Ortolano Facebook posts with comments about Attorney Leonard and Ortolano's trespass	
ZZ (X-34)	ID	4/30/21	Ortolano post on Granite Grok re: Is Nashua City Right to Know Coordinate Jesse Neumann Just Playing word Salad in his RTK Responses?	
AAA (X-35)	ID	4/30/21	Email from C. Linder to Nashua Legal Department re: Eliminate the RTK position in the legal office	
BBB (X-36)	ID	5/3/21	Excerpt from Personnel/Administrative Affairs Committee meeting minutes – Ortolano comments	
CCC (X-37)	ID	5/3/21	Email from Ortolano to Jesse Neumann, et al. re Your recent RTK request dated April 26, 2021	
DDD (X-38)	ID	5/10/21	Ortolano post re: Right to Know Demand Made for Selected Nashua City Emails	
EEE (X-39)	ID	5/11/21	Ortolano post on goodgov.org	
FFF (X-40)	ID	5/17/21	Excerpt from Budget Review Committee meeting minutes	
GGG (X-41)	ID	5/20/21	Excerpt from Board of Assessors meeting minutes	
HHH (X-42)	ID	5/20/21	Excerpt from Budget Review Committee meeting minutes	

III (X-43)	ID	5/26/21	Excerpt from Budget Review Committee meeting minutes	
JJJ (X-44)	ID	5/27/21	Union Leader article re: Nashua ordered to hand over emails initially denied in citizen's Right-to-Know request	
KKK (X-45)	ID	6/1/21	Excerpt from Budget Review Committee meeting minutes	
LLL (X-46)	ID	6/1/21	Ortolano post on Granite Grok re: Harassment Warning Requested Against Nashua's Mayor Donchess, Director Kim Kleiner, and Attorney Bolton	
MMM (X-47)	ID	6/1/21	Union Leader article re: Nashua City Hall to reopen fully on Monday	
NNN (X-48)	ID	6/2/21	Ortolano email to Nashua Legal Department re: The Incorrect Press Release on the opening of City Hall	
OOO (X-49)	ID	6/3/21	Excerpt of Public Minutes of the Board of Assessors meeting minutes	
PPP (X-50)		6/16/21	Excerpt of Report of the Finance Committee meeting minutes	
QQQ (X-51)	ID	6/17/21	Excerpt of Public Minutes of the Board of Assessors meeting minutes	
RRR (X-52)	ID	6/17/21	Excerpt of Budget Review Committee meeting minutes	
SSS (X-53)	ID	6/22/21	Union Leader article re: Nashua spending out of control, residents tell city officials	
TTT (X-54)	ID	6/23/21	Email from Ortolano to Board of Alderman, et al. re: Last Night's shocking Board of Alderman Meeting	
UUU (X-55)	ID	6/24/21	Ortolano post on Granite Grok re: Nashua Should be Ashamed of its Attorney Bolton	
VVV (X-56)	ID	6/26/21	Nashua Telegraph article re: Some residents criticize mayor's proposed 2022 budget	

WWW (X-57)	ID	6/28/21	Nashua Telegraph article re: Nashua homeowner wins tax abatement appeal; is granted attorneys' fees in separate RTK case against city	
XXX (X-58)	ID	6/30/21	Excerpt from Public Minutes of the Board of Assessors meeting minutes	
YYY (X-59)	ID	6/30/21	Email from Ortolano to Mayor's office re: Revised Bail order since my arrest	
ZZZ (X-60)	ID	7/3/21	Ortolano post on goodgov.org re: The Broken Nashua Court System	
AAAA (X-61)	ID	7/6/21	Email from Ortolano to Legal Department re: Bolton is ridiculous	
BBBB (X-62)	ID	7/8/21	Email from C. Linder to Legal Department re: Attorney Bolton's Job Performance	
CCCC (X-63)	ID	7/19/21	Ortolano Facebook post on The Nashua Scoop re: tension between Attorney Bolton and Alderwoman Lu	
DDDD (X-64)	ID	7/22/21	Ortolano post on goodgov.org re: Deputy Attorney Leonard's Misrepresentations	
EEEE (X-65)	ID	7/22/21	Ortolano Facebook post on The Nashua Scoop re: Attorney Leonard's misrepresentation	
FFFF (X-66)	ID	7/22/21	Email from Ortolano to D. Graham, et al. re: My Arrest in City Hall	
GGGG (X-67)	ID	7/23/21	Ortolano post to Granite Grok re: It's a Bad Look to Arrest Citizens in City Hall	
HHHH (X-68)	ID	7/28/21	Nashua Telegraph article re: Nashua homeowner wins tax abatement appeal; is granted attorneys' fees in separate RTK case against city	
IIII (X-69)	ID	7/30/21	Ortolano post to goodgov.org re: Rebuttal to Attorney Bolton's explanation for failure to deliver emails – July 28, 2021 Telegraph article	
JJJJ (X-70)			withdrawn	
KKKK (X-71)	ID	8/3/21	Ortolano post to goodgov.org re: Bolton ignores Court order to drive-up Legal Fees	

LLLL (X-72)	ID	8/4/21	Excerpt of Report of the Finance Committee meeting minutes	
MMMM (X-73)	ID	8/5/21	Ortolano post to goodgov.org re: A Hostile City Government	
NNNN (X-74)	ID	8/17/21	Ortolano post to goodgov.org re: More Attacks on Alderwoman Lu – Mayor Donchess fires down	
OOOO (X-75)	ID	8/17/21	Email from Ortolano to Board of Aldermen, et al. re: Phone Calls this morning for court hearing	
PPPP (X-76)	ID	8/18/21	Excerpt of Report of the Finance Committee meeting minutes	
QQQQ (X-77)	ID	8/23/21	Excerpt of Budget Review Committee meeting minutes	
RRRR (X-78)	ID	8/23/21	Ortolano post to goodgov.org re: The Nashua Legal Office – Case Study for the Abuse of the Attorney Client Privilege Exemption	
SSSS (X-79)	ID	8/25/21	Ortolano post to Granite Grok re: Nashua Provides Case Study for the Abuse of the Attorney-Client Privilege Exemption to RTK Law	
TTTT (X-80)	ID	8/26/21	Excerpt of Public Minutes of Board of Assessors Meeting minutes – Ortolano public comment	
UUUU (X-81)	ID	8/26/21	Board of Assessors Meeting – video of Ortolano public comment	
VVVV (X-82)	ID	8/30/21	Email from Ortolano to Board of Aldermen, et al. re: The Mayor’s sanctioned abuses of the Nashua Legal Office	
WWWW (X-83)	ID	8/31/21	Ortolano post to goodgov.org re: Mayor Donchess’ Sanctioned Abuses of the Nashua Legal Office	
XXXX (X-84)	ID	8/31/21	Ortolano post to Granite Grok re: Our Board of Aldermen Have Become the Mayor’s Posse	
YYYY (X-85)	ID	9/1/21	Ortolano Facebook post to The Nashua Scoop re: running for DWP commissioner	

ZZZZ (X-86)	ID	9/16/21	Ortolano post to goodgov.org re: Elect Laurie Ortolano for the Board of Public Works	
AAAAA (X-87)	ID	10/9/21	Ortolano post to goodgov.org re: City Refuses to Pay on Court Order Sanctions	
BBBBB (X-88)	ID	10/9/21	Ortolano post to Granite Grok re: Nashua: Local Elections ARE Partisan!	
CCCCC (X-89)	ID		withdrawn	
DDDDD (X-90)	ID	10/30/21	Email from Ortolano to Bolton, et al. re: Leaked Attorney Client Information	
EEEEEE (X-91)	ID	10/31/21	Email from Ortolano to Bolton, et al. re: Attorney Client Information Leak, Again	
FFFFF (X-92)	ID	11/12/21	Ortolano post to goodgov.org re: The Nashua Legal Offices abuse of Seniors	
GGGGG (X-93)	ID	11/13/21	Ortolano post to Granite Grok re: The Nashua Legal Offices Abuse of Seniors	
HHHHH (X-94)	ID	12/15/21	Ortolano post Granite Grok re: Nashua's Thug Leadership	
IIIII (X-95)	ID	01/16/22	Ortolano post to Granite Grok re: Nashua City Attorney Steve Bolton is Unfit for Duty	
JJJJJ (X-96)	ID	08/27/22	Ortolano post to goodgov.org re: The Colossal Stupidity of the Nashua Legal Office	
KKKKK (X-97)	ID	5/21/24	Email from M. Perry to Ortolano re: RTK Request 2024-146-OCC	
LLLLL	ID		Megan Caron Compilation of Plaintiff's Board Attendance	

The defendants Bolton and Leonard reserve the right to revise and supplement this Amended Exhibit List through the time of trial.

Respectfully submitted,

STEVEN A. BOLTON,

By his Counsel,

UPTON & HATFIELD, LLP,

Date: April 8, 2025

/s/ Russell F. Hilliard

Russell F. Hilliard; NHBA #1159
159 Middle Street
Portsmouth, NH 03801
(603) 436-7046
rhilliard@uptonhatfield.com

Brooke Lovett Shilo; NHBA #20794
Madeline K. Matulis; NHBA #276135
10 Centre Street; PO Box 1090
Concord, NH 03302-1090
(603) 224-7791
bshilo@uptonhatfield.com
mmatulis@uptonhatfield.com

and

CEILA K. LEONARD

By her attorneys

**CULLEN COLLIMORE SHIRLEY,
PLLC,**

Dated: April 8, 2025

/s/ Brian J.S. Cullen

Brian J.S. Cullen (Bar No. 11265)
37 Technology Way, Suite 3W2
Nashua, NH 03060
(603) 881-5500
bcullen@cullencollimore.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was forwarded on this day to all counsel of record through the Court's E-filing system.

/s/ Russell F. Hilliard
Russell F. Hilliard